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11 Mr. Boland

12
13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,) Case No. 2:21cr233-KJM
16)
17 Plaintiff,) **STIPULATION AND [PROPOSED] ORDER TO**
18) **CONTINUE STATUS CONFERENCE AND**
19) **EXCLUDE TIME**
20)
21 JOHN BOLAND,) Date: November 8, 2022
22) Time: 9:30 a.m.
23) Defendant.) Judge: Hon. Dale A. Drozd
24)
25 _____

26 IT IS HEREBY STIPULATED and agreed by and between United States Attorney
27 Phillip A. Talbert, through Assistant United States Attorney James Robert Conolly, counsel for
28 Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hootan
Baigmoammadi, counsel for Defendant John Boland, that the status hearing currently set for
November 8, 2022, at 9:30 a.m. be continued to January 24, 2023, at 9:30 a.m.

29 The parties specifically stipulate as follows:

30 1. By previous order, this matter was set for a status on November 8, 2022, at 9:30 a.m.
31 2. Mr. Boland now moves to continue the status conference to January 24, 2023, at 9:30
32 a.m.
33 3. The government has produced discovery to Mr. Boland and it plans to produce more
34 discovery in short order. The government and Mr. Boland also intend to begin active
35 plea negotiations to hopefully resolve the case.

4. The defense requires additional time to review the discovery; investigate and research possible defenses; research potential pretrial motions; consult with Mr. Boland; explore potential resolutions to the case; and otherwise prepare for trial.
5. Defense counsel believes that failure to grant the requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. *See U.S.C. § 3161(h)(7)(B)(iv).*
6. The government does not object to the continuance.
7. The parties jointly request the Court to find that the ends of justice served by granting the continuance outweighs the best interest of the public and Mr. Boland in a speedy trial; and for the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), that the time period between November 8, 2022 and January 24, 2023, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A) (Local Code T4).

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: November 3, 2022

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Defendant
Mr. Boland

Date: November 3, 2022

PHILLIP A. TALBERT
United States Attorney

Attorneys for Plaintiff

/s/ James Robert Conolly
James Robert Conolly
Assistant United States Attorney

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order. However, no further continuances of the status conference in this case will be granted absent a compelling showing of good cause.

IT IS SO ORDERED.

Dated: November 3, 2022

Dale A. Droyd
UNITED STATES DISTRICT JUDGE